Case:16-00470-ESL13 Doc#:77 Filed:01/24/17 Entered:01/24/17 17:12:37 Desc: Main Document Page 1 of 6

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

TOMAS M. DUEÑO ESPADA MERCEDES E. LUGO RODRIGUEZ

DEBTOR (S)

CHAPTER 13

CASE NO.: 16-00470 ESL

CONTINUANCE OF HEARING

TO THE HONORABLE COURT:

COMES NOW the debtors through the undersigned attorney and very respectfully state and pray as follows:

- 1) The confirmation hearing in this case is scheduled for tomorrow, January 25, 2017. Debtors need to file two additional objections to claim in this case given the plan is currently insufficiently funded.
- 2) Debtors already filed an objection to claim filed by Carolina Building, and will be filing two other objection to claims against the Internal Revenue Service and the Puerto Rico Treasury Department.
- 3) Thus Debtors need additional time to confirm the case. These objections affect sufficiency.

WHEREFORE debtors very respectfully request from this Honorable Court to rescheduled the confirmation hearing.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date of filing a copy of this motion has been forwarded to every creditor in the master list address that do not have electronic filing records and for those who have the notification has been made by means of the CM/ECF System, including the Chapter 13 Trustee and the U.S. Trustee for the District of Puerto Rico.

In Carolina, Puerto Rico this January 24, 2017

MORENO & SOLTERO, LLC /s/ROSANA MORENO RODRIGUEZ ATTORNEY FOR DEBTOR USDC #221903 P.O. BOX 679 TRUJILLO ALTO, PR 00977 PHONE: (787) 750-8160 / 8166 / (787) 287-4116

FAX: (787) 750-8243

EMAIL: rmoreno@morenosolterolaw.com

asoltero@morenosolterolaw.com

ADVANCE COLLECTION SERVICES, INC. PO BOX 364607 SAN JUAN, PR 00936-4607

AT & T MOBILITY PO BOX 10330 FORT WAYNE, IN 46851-0330

AUTORIDAD ACUEDUCTOS ALCANTARILLADOS PO BOX 70101 SAN JUAN, PR 00936-8101

BANCO POPULAR DE PR PO BOX 70100 CARD PRODUCTS DIVISION SAN JUAN, PR 00936

BANCO POPULAR DE PR MORTGAGE SERVICING DEPARTMENT PO BOX 362708 SAN JUAN, PR 00936-2708

BANCO POPULAR DE PUERTO RICO PO BOX 366818 BANKRUPTCY DEPARTMENT SAN JUAN, PR 00936-6818

BAUTISTA CAYMAN ASSET COMPANY CAPITAL CROSSING PUERTO RICO LLC 221 AVE. PONCE DE LEON 221 PLAZA HATO REY, PR 00918 CICA COLLECTION AGENCY, INC. PO BOX 12338
SAN JUAN, PR 00914-0338

CITIFINANCIAL PO BOX 70919 CHARLOTTE, NC 28272-0919

COLLECTION & MANAGEMENT ASSISTANCE INC. 239 ARTERIAL HOSTOS AVE SUITE 1102 CAPITAL CENTER, SOUTH TOWER SAN JUAN, PR 00918-1477

CRIM PO BOX 195387 SAN JUAN, PR 00919-5387

DEPARTAMENTO DE HACIENDA CAPITOL CENTER TORRE NORTE SUITE 1504 235 AVE. ARTERIAL HOSTOS SAN JUAN, PR 00918-1454

DTOP
PO BOX 41243
DIRECTORIA DE SERVICIOS AL CONDUCTOR
SAN JUAN, PR 00940-1243

FIRST BANK DE PR PO BOX 8318 DEPARTAMENTO DE HIPOTECAS SAN JUAN, PR 00910-0318 IRS
PO BOX 7346
PHILADELPHIA, PA 19101-7346

LCDO. NICOLAS QUIÑONES CASTRILLO PO BOX 195389 ATTORNEY OF DORAL BANK SAN JUAN, PR 00919-5389

MIDLAND FUNDING LLC
BY AMERICAN INFOSOURCE LP AS AGENTRO B
HOUSTON, TX 77210-4457

MIDLAND FUNDING LLC
BY AMERICAN INFOSOURCE LP AS AGENT
PO Box 4457
Houston, TX 77210-4457

MUNICIPALITY SAN JUAN SAN JUAN P.O. BOX 70179 PR, PR 00936-8179

NW MANAGEMENT GROUP INC URB EL CEREZAL CALLE PARANA #1650 SAN JUAN, PR 00926

POPULAR AUTO
PO BOX 366818
SAN JUAN, PR 00936-6818

PR ACQUISITIONS, LLC PO BOX 194499 SAN JUAN, PR 00919-4499

RUSHMORE LOAN MANAGEMENT SERVICES PO BOX 11907 SAN JUAN, PR 00922

TOYOTA CREDIT DE PR PO BOX 366251 SAN JUAN, PR 00936